

# EXHIBIT A

**LAW OFFICES OF ROBERT A. JONES**

Filing Attorney: Robert A. Jones, Esq.

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Phone No.: (973) 994-3030

Attorney for Plaintiff(s)

FRED SCHLAFFER AND DEENA  
SCHLAFFER

Plaintiffs,

v.

UNITED AIRLINES, INC., THE PORT  
AUTHORITY OF NEW YORK & NEW  
JERSEY, JOHN DOES 1-10 (being fictitious  
persons whose identities are currently  
unknown) and ABC CO. 1-10 (being fictitious  
business entities whose identities are currently  
unknown),

Defendants

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: ESSEX COUNTY  
DOCKET NO.:

Civil Action

**COMPLAINT  
AND JURY DEMAND**

Plaintiffs, Fred Schlaffer and Deena Schlaffer, residing at 8277 Avenida Navidad,  
#2, San Diego, California, by way of complaint against the Defendants above, say:

**FIRST COUNT**

1. On or about August 28, 2021, Plaintiff, Fred Schlaffer was lawfully on the  
premises known as Newark Liberty International Airport, Terminal C, Level 1 in  
Newark, New Jersey.

2. At the aforesaid time, the aforementioned property was owned, operated,  
leased, managed, controlled, maintained, repaired, inspected, designed and/or  
constructed by defendants, UNITED AIRLINES, INC., THE PORT AUTHORITY OF  
NEW YORK & NEW JERSEY, LLC, JOHN DOES 1-10 (being fictitious persons whose

identities are currently unknown) and/or ABC CO. 1-10 (being fictitious business entities whose identities are currently unknown).

3. The aforesaid property was owned, operated, leased, managed, controlled, maintained, repaired, inspected, designed and/or constructed by defendants UNITED AIRLINES, INC., THE PORT AUTHORITY OF NEW YORK & NEW JERSEY, LLC, LLC, JOHN DOES 1-10 (being fictitious persons whose identities are currently unknown) and/or ABC CO. 1-10 (being fictitious business entities whose identities are currently unknown) in such a careless, reckless and negligent manner so as to cause a dangerous and hazardous condition to exist thereon.

4. As a result of the aforesaid dangerous and hazardous condition in the floor, Plaintiff was caused to fall.

5. As a result of the fall, plaintiff sustained severe and grievous personal injuries which have caused and will in the future cause pain and suffering, resulting in damages for which she makes this claim.

WHEREFORE, Plaintiffs Fred Schlaffer and Deena Schlaffer hereby demands judgment against the defendants, jointly and severally, for damages, interest and costs of suit.

### **SECOND COUNT**

1. Plaintiffs hereby repeat and re-allege herein each and every allegation set forth in the First Count as if set forth fully herein.
2. At all times alleged herein, Plaintiff, Deena Schlaffer, was the lawful spouse of Plaintiff, Fred Schlaffer.

3. As a direct and proximate result of the negligence, recklessness and carelessness of the Defendants, the Plaintiff, Deena Schlaffer, has been caused to lose and will continue to lose, the services, society, companionship, and consortium of her spouse and has been caused to spend and will continue to spend great sums of money to secure medical care and treatment for her spouse.

**WHEREFORE**, Plaintiff, Deena Schlaffer, hereby demands judgment against Defendants, jointly and severally, for damages, interest and costs of suit.

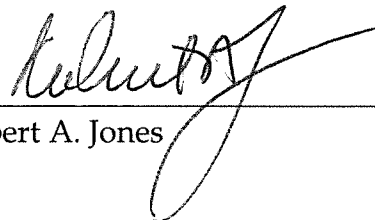
**JURY DEMAND**

Plaintiffs hereby demands a trial by jury as to all issues.

LAW OFFICES OF ROBERT A. JONES  
Attorney for Plaintiffs

Dated: 2/24/22

By:

  
Robert A. Jones

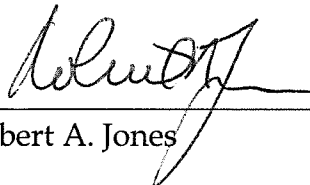
**DESIGNATION OF TRIAL COUNSEL**

Pursuant to Rule 4:25-4, Robert A. Jones, Esq. is hereby designated as trial counsel on behalf of Plaintiffs.

LAW OFFICES OF ROBERT A. JONES  
Attorney for Plaintiff

Dated: 2/24/22

By:

  
Robert A. Jones

**CERTIFICATION**

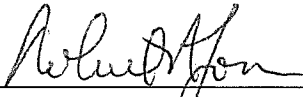
Pursuant to Rule 4:5-1, I hereby certify that the within matter is not the subject of any other action or arbitration proceeding, nor is any other action or arbitration proceeding contemplated.

I further certify that at this time, I know of no other party that should be joined in this action.

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).

LAW OFFICES OF ROBERT A. JONES  
Attorney for Plaintiffs

Dated: 4/24/22

By:   
Robert A. Jones